State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
AUGLAIZE COUNTY

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 03-17412
Fac ID: 0306000127
DATE: 6/12/2008

Industrial Paint and Strip West LLC
David Whitaker
1000 Commerce Court PO Box 10
Waynesfield, OH 45896

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **NWDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 6/12/2008**
Terms and Conditions	**Effective Date: 6/12/2008**

FINAL PERMIT TO INSTALL 03-17412

Application Number:	03-17412
Facility ID:	0306000127
Permit Fee:	**$200**
Name of Facility:	Industrial Paint and Strip West LLC
Person to Contact:	David Whitaker
Address:	1000 Commerce Court PO Box 10 Waynesfield, OH 45896

Location of proposed air contaminant source(s) [emissions unit(s)]:
1000 Commerce Court
Waynesfield, **Ohio**

Description of proposed emissions unit(s):
Installation of a electro deposition paint line with convection cure oven.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
OC	19.49
NOx	5.69

Emissions Unit ID: **K001**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment - (K001) - Electro deposition paint tank with 1 propane fired spray cleaner process heat oven, 1 propane fired immersion cleaner process heat oven, 1 propane fired immersion zinc phosphate process heat oven , and 1 propane fired convection cure oven

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05 (A) (3)	4.09 lbs organic compound (OC)/hr & 17.91 tons OC/yr from coating operations 263.2 lbs OC/month & 1.58 tons OC/yr from solvent make-up
OAC rule 3745-31-05 (A) (3) (b)	See A.2.b
OAC rule 3745-21-09 (U) (1) (c)	Coatings applied in the coating operation shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (See A.2.a)
ORC 3704.03 (F) (4) (b) OAC rule 3745-114-01	See F.1.

2. Additional Terms and Conditions

2.a The permittee adds organic materials to the electro deposition paint tank associated with this emissions unit under the following scenarios:

i. during the day, only compliant materials (black feed) are added;

ii. during the day, both compliant (black feed) and noncompliant materials (paint additive) are added; and

iii. during the day, only noncompliant solvents or noncompliant mixture of materials are added.

In order to ensure compliance with the VOC content limitation (in pounds/gallon

of coating, excluding water and exempt solvents), the permittee shall be required to monitor and keep records of the above scenarios as required under section C.1. of this permit.

2.b The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A) do not apply to the NOx emissions from this air contaminant source since the uncontrolled potential to emit for NOx is less than ten tons per year.

The potential to emit for NOX for this emissions unit is 5.69 tons NOx per year and was determined by multiplying a maximum heat input rate of 6.2 mmBtu/hr by an AP-42 emission factor of 0.21 lb NOx/mmBtu, (AP-42 Chapter 1.3, table 1.3-2, 10/96), by an maximum operating schedule of 8760 hours per year and dividing by 2000 lbs/ton.

The potential to emit for all other air contaminant emissions associated with the products of combustion are negligible and will not be addressed as part of this permit.

B. Operational Restrictions

1. None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the electro deposition paint tank:

   a. the name and identification number of each material added to the paint tank;

   b. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each material added to the paint tank; and

   c. the number of gallons of each material added to the paint tank, excluding water and exempt solvents.

2. On the days when a mixture of materials are added to the dip tank, the permittee shall record the daily, volume-weighted average VOC content of the combination of materials added to the dip tank, in pounds per gallon, excluding water and exempt solvents [calculated by summing (C.1.b. x C.1.c.) for all materials, divided by the total number of gallons, excluding water and exempt solvents, of all materials added to the system].

3. On the days when a noncompliant material (solvent) is added to the dip tank or a mixture of materials is added to the dip tank and the calculated daily, volume-weighted average VOC content exceeds the allowable VOC content limitation, the permittee shall record the VOC content of the entire tank, in pounds per gallon, excluding water and exempt solvents. This shall be determined by collecting a post-material-add composite sample from the dip tank and performing a laboratory analysis of the VOC content of the sample in accordance with the procedures specified in section E.2.b. this permit.

4. The permittee shall maintain monthly records of the following information for the coating operation:

   a. the company name and identification for each coating material employed;

   b. the volume, in gallons, of each coating material employed;

   c. the OC content of each coating material employed, in pounds per gallon;

   d. the OC emission rate, in pounds, for each coating material employed (C.4.b. x C.4.c.);

   e. the total OC emissions rate from all coating materials employed (summation of C.4.d.), in pounds; and

   f. the annual year-to-date OC emissions, in tons, (summation of C.4.e. x 1 ton/2000 pounds) for each calendar month to date from January to December.

5. The permittee shall maintain monthly records of the following information for solvent make-up:

   a. the company name and identification for each solvent make-up material employed;

   b. the volume, in gallons, of each solvent make-up material employed;

   c. the OC content of each solvent make-up material employed, in pounds per gallon;

   d. the OC emission rate, in pounds, for each solvent make-up material employed (C.5.b. x C.5.c.);

e. the total OC emissions rate from all solvent make-up materials employed (summation of C.5.d.), in pounds; and

f. the annual year-to-date OC emissions, in tons, (summation of C.5.e. x 1 ton/2000 pounds) for each calendar month to date from January to December.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing an exceedance of the VOC content limitation of 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

   a. any exceedance of the monthly solvent make-up material emissions limitation specified in Section A.1. of this permit.

   These reports shall be submitted in accordance with the general terms and conditions of this permit.

3. The permittee shall submit annual reports that specify the total OC emissions from coating operations for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

4. The permittee shall submit annual reports that specify the total OC emissions from solvent make-up operations for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

   a. <u>Emission Limitation:</u>
   4.09 lbs OC/hr from coating operations

Applicable Compliance Method:
The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 22.7 gallons per hour and a maximum VOC content of 0.18 lb/gallon.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

b. Emission Limitation:
17.91 tons OC/yr from coating operations

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.2. of this permit.

c. Emission Limitation(s):
263.2 lbs OC/month & 1.58 tons OC/yr from solvent make-up operations

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.3. of this permit.

d. Emission Limitation:
Coatings applied in the coating operation shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.1. of this permit.

The daily, volume-weighted average of all the materials added to the dip tank shall be calculated using the following equation:

Daily volume-weighted average = [summation of (Gi X VOCi)] / [summation of Gi]

for i = 1 to n

where:

i = 1, 2, 3, ...n

n = the total number of the different types of materials added to the dip tank for that day

Gi = the number of gallons of material i (excluding water and exempt solvents) added to the dip tank for that day

VOCi = the VOC content of material i, in pounds/gallon of material, excluding water and exempt solvents

2. Determining VOC contents of the coating materials:

a. Any determination of VOC content, solids content, or density of a coating material added to the paint tank shall be based on the coating material, as received, including the use of any thinning or viscosity reducer. The permittee shall determine the composition of the coating materials by formulation data supplied by the manufacturer of the material or from data determined by an analysis of each coating material, as received, by Reference Method 24 *of 40 CFR, Part 60, Appendix A*. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine the VOC contents of the coating materials by Reference Method 24 or an equivalent or USEPA-approved alternative method.

b. For the VOC contents of the samples taken from the dip tank pursuant to A.III.1.e, the permittee shall determine the composition of the coatings through the use of USEPA Method 24 of 40 CFR, Part 60, Appendix A, and, if the permittee elects, an equivalent or USEPA-approved alternative method to confirm the Method 24 test result.

["VOC content" means all volatile organic compounds that are in a coating expressed as pounds of VOC per gallon, excluding water and exempt solvents, and/or kilograms of VOC per liter of coating solids.]

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Industrial Paint and Strip West LLC **Facility ID: 0306000127**
PTI Application: 03-17412
Issued: 6/12/2008

Emissions Unit ID: **K001**

SIC CODE 1234 SCC CODE 4-02-025-01 EMISSIONS UNIT ID K001
EMISSIONS UNIT DESCRIPTION Misc. Metal Parts Electro deposition Paint Line with Convection Cure Oven.
DATE INSTALLED Upon Issuance of PTI
EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	Attainment	3.06 lbs/hr	9.55	4.09 lbs/hr	17.91
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Solvent make-up		263.2 lbs/month	1.58	263.2 lbs/month	1.58

APPLICABLE FEDERAL RULES:

NSPS? N NESHAP? N PSD? N OFFSET POLICY? N

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A